

1 AARON D. FORD
Attorney General
2 KAYLA D. DORAME, Bar No. 15533
Deputy Attorney General
3 State of Nevada
Public Safety Division
4 100 N. Carson Street
Carson City, NV 89701-4717
5 Tel: (775) 684-1259
E-mail: kdorame@ag.nv.gov
6

7 *Attorneys for Defendants*
8
9

10 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 WILLIAM LEWIS,

12 Plaintiff,

13 vs.

14 DR. TED HANF, et al.,

15 Defendants.
16

Case No. 3:19-cv-00625-GMN-CLB

**DEFENDANTS' MOTION TO EXTEND
THE DEADLINE TO FILE THE
STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE
(FIRST REQUEST)**

17 Defendants, by and through counsel, Aaron D. Ford, Attorney General of the State
18 of Nevada, and Kayla D. Dorame, Deputy Attorney General, move to extend the deadline
19 to file the Stipulation and Order for Dismissal with Prejudice in this matter by 7 days.

20 William Lewis is currently in the lawful custody of the Nevada Department of
21 Corrections (NDOC) and is housed at Warm Springs Correctional Center (WSCC). On
22 March 24, 2021, Lewis and Defendants participated in an Early Mediation Conference
23 where a settlement was reached. ECF No. 23. The original deadline to file the
24 Stipulation and Order for Dismissal with Prejudice was scheduled for April 22, 2021. *Id.*

25 Federal Rule of Civil Procedure 6(b)(1) governs enlargements of time and provides
26 as follows:

27 When an act may or must be done within a specified time, the
28 court may, for good cause, extend the time: (A) with or without
motion or notice if the court acts, or if a request is made, before

1 the original time or its extension expires; or (B) on motion made
2 after the time has expired if the party failed to act because of
excusable neglect.

3 Defense counsel requests a seven (7) day extension to obtain the necessary
4 signatures from the proper parties. Defense counsel never received the signed settlement
5 agreement or stipulation and order from Lewis, so Defense counsel had to reach out to
6 Lewis' caseworker to obtain those documents signed. Defense counsel only obtained those
7 documents in the afternoon of April 22, 2021 and still needs a signature from their client.

8 Good cause exists to extend time to file the Stipulation and Order for Dismissal
9 because Defense counsel had to reach out to various individuals to obtain those
10 documents and needs only a short amount time to obtain an additional signature.
11 Defense counsel requests until **April 29, 2021** to file the stipulation and order.

12 DATED this 22nd day of April, 2021.

13 AARON D. FORD
14 Attorney General

15 By: /s/ Kayla D. Dorame
KAYLA D. DORAME, Bar No. 15533
16 Deputy Attorney General

17 *Attorneys for Defendants*

18
19 IT IS SO ORDERED.

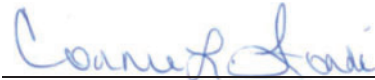
20 Dated: April 26, 2021

21
22 
23 _____
UNITED STATES MAGISTRATE JUDGE
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 22nd day of April, 2021, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION TO EXTEND THE DEADLINE TO FILE THE STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE (FIRST REQUEST)**, by depositing for mailing via the U.S. Postal Service, to the following:

William Lewis #1169143
Warm Springs Correctional Center
P.O. Box 7007
Carson City, NV 89701



An employee of the
Office of the Attorney General